

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CHARLOTTE FREEMAN, et al.,

Plaintiffs,

-against-

HSBC HOLDINGS PLC, et al.,

Defendants.

14-CV-6601 (DLI/CLP)

NOTICE OF DEFENDANTS' MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the Amended Complaint (annexed hereto), Defendants' Joint Memorandum in Support of Motion to Dismiss pursuant to Federal Rule of Civil Procedure ("Rule") 12(b)(6); Memorandum of Law of Defendants HSBC Holdings PLC, HSBC Bank PLC, HSBC Bank Middle East Limited, HSBC Bank USA, N.A., and The Royal Bank of Scotland N.V. in Support of Motion to Dismiss pursuant to Rule 12(b)(6); Defendant Commerzbank AG's Supplemental Memorandum of Law in Support of Its Motion to Dismiss pursuant to Rules 12(b)(2) and 12(b)(6); Memorandum of Law of Defendant Credit Suisse AG in Support of Motion to Dismiss pursuant to Rule 12(b)(6); and all prior pleadings and proceedings herein, Defendants HSBC Holdings PLC, HSBC Bank PLC, HSBC Bank Middle East Limited, HSBC Bank USA, N.A., Barclays Bank PLC, Standard Chartered Bank, The Royal Bank of Scotland N.V., Commerzbank AG and Credit Suisse AG hereby move this Court, before the Honorable Dora L. Irizarry, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an order pursuant to Rule 12(b)(6) and, with respect to Defendant Commerzbank AG, also Rule 12(b)(2), dismissing the Amended

Complaint in its entirety with prejudice; and granting such other and further relief as the Court deems just and proper.

Date: May 29, 2015

Respectfully submitted,

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VIA ECF